

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

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ANDREW R. PERRONG,

INDEX NO.: 22 CIV. 03733 (JFM)

Plaintiff,

- against -

CMI MARKETING RESEARCH INC. et al.

Defendants.

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**DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S
COMPLAINT FOR FAILURE TO STATE A CLAIM**

PLEASE TAKE NOTICE that, upon the attached Memorandum of Law, and all the pleadings involved in the above entitled action, Defendants CMI Marketing Research, Inc. and Carol McMahon ("Defendants"), by their attorneys Hill, Betts and Nash LLP and Deasey, Mahoney & Valentini, hereby move this Court at the United States District Court for the Eastern District of Pennsylvania for an Order, pursuant to FRCP 12b(6), dismissing Plaintiff's Complaint with prejudice for failure to state a claim upon which relief can be granted and for such further other relief that this Court deems just and proper.

Dated: New York, New York
February 27, 2023

/s/ Elizabeth A. McCoy
Elizabeth A. McCoy (EAM -8448)
(Admitted Pro Hac Vice)
Attorneys for Defendants
HILL, BETTS & NASH LLP
14 Wall Street, Suite 5H
New York, New York 10005
(212) 839-7000

George Zacharkow, Esq.
Deasey, Mahoney & Valentini, Ltd.
1601 Market Street, Suite 3400
Philadelphia, PA 19103
(215) 587-9400